

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

**ASHEVILLE DIVISION**

CARYN DEVINS STRICKLAND, )  
                                )  
                                )  
*Plaintiff,*              )  
                                )  
v.                             ) Civil No. 1:20-cv-00066-WGY  
                                )  
UNITED STATES, *et al.*,    )  
                                )  
*Defendants.*             )

**NOTICE OF SEALED FILING**

Pursuant to Local Rule 6.1, Plaintiff hereby provides notice that her Amended Proposed Findings of Fact and Conclusions of law, filed at ECF No. 387, contain redacted material pursuant to the Court's prior sealing orders. *See* Entry Order Dated June 21, 2023 (TEXT-ONLY ORDER granting 251 Consent MOTION to Seal); ECF Nos. 336, 337 (sealing Plaintiff's deposition testimony from April 25, 2023 and October 12, 2023). The sealed material is contained in Plaintiff's Courtesy Copy Ex. 23 and Plaintiff's Courtesy Copy Ex. 70.<sup>1</sup> Plaintiff has filed a redacted version of ECF No. 387 on the public docket and an unredacted version under seal.

In addition, Plaintiff has redacted references to Plaintiff's Courtesy Copy Ex. 58, which contains the MeToo evidence of other complaints of harassment, discrimination, and retaliation against the FDO. This Court ruled during the trial that it would allow Plaintiff's proposed findings to serve as a written offer of proof with respect to Exhibit BB. The Court also indicated during trial that it would treat this exhibit as under seal for purposes of determining whether this

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<sup>1</sup> These sealed exhibits are subject to a pending motion to admit. *See* ECF No. 364.

exhibit should be admitted or excluded. Plaintiff therefore respectfully requests the Court's guidance on whether references to this exhibit should be filed publicly or under seal to ensure that her objections to the admission of Exhibit BB are part of the record for purposes of appeal.

This the 3rd day of January, 2024.

Respectfully Submitted,

/s/ Cooper Strickland

Cooper Strickland  
P.O. Box 92  
Lynn, NC 28750  
Tel. (828) 817-3703  
cooper.strickland@gmail.com

*Counsel for Plaintiff*

## CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of January, 2024, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Joshua M. Kolsky at Joshua.Kolsky@usdoj.gov

Madeline M. McMahon at madeline.m.mcmahon@usdoj.gov

Danielle Young at Danielle.young2@usdoj.gov

Dorothy Canevari at Dorothy.m.canevari@usdoj.gov

/s/ Cooper Strickland

Cooper Strickland

N.C. Bar No. 43242

P.O. Box 92

Lynn, NC 28750

Tel. (828) 817-3703

cooper.strickland@gmail.com